



Wednesday, April 1, 2015  
Via Online Filing

Attn: PSC Reg. Dckt.No. 12  
Delaware Public Service Commission  
861 Silver Lake Boulevard  
Cannon Building, Suite 100  
Dover, Delaware 36130-4260

RE: Network Communications International Corp.  
Docket No. 12 – Comments – Investigation and Adoption of Rules to Govern  
Payphone Services within the State of Delaware

To Whom it may Concern:

Please find the comments to be filed in the above referenced docket. Any questions regarding this filing may be directed to my attention at (903) 757-4455 X 1004 or via email at [stephanie.jackson@ncic.com](mailto:stephanie.jackson@ncic.com).

Sincerely,

A handwritten signature in black ink that reads "Stephanie Jackson". The signature is fluid and cursive, with the first name and last name clearly legible.

Stephanie Jackson

Network Communications International Corp.

Network Communications International Corp.

Response to:

Docket No. 12:           Comments - Revised Proposed Rules for Inmate Calling Services (ICS) –  
Investigation and Adoption of Rules to Govern Payphone Services  
within the State of Delaware

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Network Communications International Corp. hereinafter "NCIC", files comments suggesting the PSC propose rulemaking in regards to inmate telephone rate caps, provider assessed ancillary fees and single-payment products. NCIC has consistently advocated for balance in regards to the needs of inmates, their families, correction facilities and ICS providers - as has been done by the Alabama Public Service Commission's recent JCS ruling (*January 2015*). The State of Alabama has taken a fair approach in restructuring their inmate telephone rules and has been nationally and federally recognized as a reputable example of how all inmate rate structures should be constituted.

Most states have implemented caps on inmate telephone rates over the years however along with the transition from Traditional Collect Calling to Prepaid Collect Calling, where billing is done via a credit card rather than a LBC phone bill, providers are adding transaction/funding fees to their tariffs, allowing them to assess ancillary fees in addition to the allowed per-minute rates. As the commission % paid on the completed calls to inmate facilities become more and more competitive, the fees and single-payment product offerings, along with prices, are increasing. Single pay products are described as inmate collect calls to wireless recipients that are billed either to the recipient's wireless account via a third-party billing service or to the recipient's debit/credit card by a third-party billing service. By using a third-party, who is neither incorporated nor certified to operate in a state, to bill single payment (Convenience) products allows ICS providers to bypass regulations, sales and



franchise taxes, state and federal required fees and USF as well as hide revenue from commission payment requirements in a contract as they are not revenues billed by the ICS provider.

NCIC urges the PSC to consider adopting the following rate caps for Collect and Prepaid calls, Ancillary Fees and Single Payment Products such as Text Collect and Single Payment Credit/Debit card calls for Inmate Telephone calls:

	Rate Caps- Collect and Prepaid		Single Payment Products	
Jurisdiction	Collect	Prepaid	Text Collect	Credit/Debit Card
Local	\$.25 per minute	\$.21 per minute	\$.25 per minute	\$.21 per minute
Intrastate	\$.25 per minute	\$.21 per minute	\$.25 per minute	\$.21 per minute

Ancillary Fee Caps	
Payment Fees	Maximum Fee
Money order or check mailed to provider or payment via online banking transfer	\$0.00
3rd Party Payment Vendor such as Western Union or MoneyGram	Vendor Fee (not to exceed \$5.95) + \$0.00 (no provider fee)
Debit/credit card online or IVR; or by cash or debit/credit card at the ICS provider's kiosk	\$3.00
Web based funding transaction	\$3.00
Debit/Credit card via a live agent	\$5.95

NCIC recommends that in the efforts to reform telecom/payphone rules, Delaware PSC take a similar approach to the Alabama PSC regulation of inmate phone services, staying in-line with the current FCC and assertive state regulatory agendas. Ideally, all rate and ancillary fee caps should be implemented within 90 days following the effective date of the order.



Respectfully submitted,

/s/William L. Pope

William L. Pope, President  
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